

EXHIBIT A

The person or persons designated shall be prepared to testify on the following:

1. The responses, affirmative defenses and the factual bases thereof in Selective's answer to the amended complaint.
2. Selective's responses set forth in "Defendant's Rule 26(a)(1) Initial Disclosure."
3. Selective's responses to **a)** Plaintiffs' first and second set of Interrogatories Directed to Selective Way Insurance Company; **b)** Plaintiffs' first and second set of Document Requests Directed to Selective Way Insurance.
4. The documents submitted in response to discovery requests.
5. Issuance of insurance policies to White Oak Builders, Inc.
6. Issuance of insurance policy S1352759 to White Oak Builders, Inc.
7. The risks covered by policy S1352759.
8. The risks covered by policy S3208281.
9. The risks covered by policy S3207960.
10. Risks covered by policies issued to contractors.
11. Claims made against policy S1352759, S3208281, S3207960.
12. Procedure for handling claims in general, and the procedure for handling claims of the character and kind submitted by Plaintiffs, if different.
13. Selective's policy statements and communications in connection with the language contained in its policies.
14. Selective's policy statements and communications in connection with handling claims.

15. Selective's policy statements and communications in connection with handling claims of the character and kind submitted by Plaintiffs.

16. The assessment of Plaintiffs' claim.

17. The handling of Plaintiffs' claim.

18. The denial of coverage letter dated October 13, 1999.

19. The decision and bases for denying coverage and for not providing a defense.